

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant,

WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

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**STIPULATION TO EXTEND TIME**

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever (“Unilever”), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. (“Defendant”) (hereinafter collectively, the “Parties”), stipulate and agree that all deadlines set forth in the Court’s January 22, 2015 order (the “Order”) shall be extended by 45 days, as follows:

Event	Current Deadline	Proposed Deadline
Initial expert reports due	June 5, 2015	July 20, 2015
Rebuttal expert reports due	July 10, 2015	August 24, 2015
Close of all fact discovery	August 14, 2015	September 28, 2015

Event	Current Deadline	Proposed Deadline
<b>Close of all expert discovery</b>	August 31, 2015	October 15, 2015
<b>Last day to file case dispositive motions</b>	September 14, 2015	October 29, 2015

This stipulation is the parties' first request to extend the deadlines set forth in the Court's January 22, 2015 order. The requested extension is not being sought for the purpose of delay. The parties are currently engaged in settlement discussions. The parties have drafted and exchanged draft versions of a proposed settlement agreement and hope to amicably resolve this matter. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's January 22, 2015 order be continued as set forth above. Accordingly, the Parties submit the enclosed proposed Revised Scheduling Order.

/s/ *Vanessa Hewkey*  
DUANE MORRIS LLP  
Gregory P. Gulia  
Vanessa C. Hew  
1540 Broadway  
New York, New York 10036-4086  
Telephone: (212) 692-1000  
Facsimile: (212) 692-1020  
E-mails: [gpgulia@duanemorris.com](mailto:gpgulia@duanemorris.com)  
[ychew@duanemorris.com](mailto:ychew@duanemorris.com)

*Attorneys for Plaintiff/Counterclaim Defendant  
Conopco, Inc. d/b/a Unilever*

/s/ *Natalie Hanlon-Leh*  
Natalie Hanlon-Leh (*pro hac vice*)  
Wilmer Cutler Pickering Hale and Dorr LLP  
1255 17<sup>th</sup> Street, Suite 1660  
Denver, CO 80202  
E-mail: [natalie.hanlonleh@wilmerhale.com](mailto:natalie.hanlonleh@wilmerhale.com)

Edward Rosenthal  
Beth Ilana Goldman  
Nicole Bergstrom  
Frankfurt Kurnit Klein & Selz PC  
488 Madison Avenue  
New York, NY 10022  
Telephone: (212)-705-4817  
Fax: (212)-593-9175  
E-mails: [erosenthal@fkks.com](mailto:erosenthal@fkks.com)  
[bgoldman@fkks.com](mailto:bgoldman@fkks.com)  
[nbergstrom@fkks.com](mailto:nbergstrom@fkks.com)

*Attorneys for Defendant/Counterclaim Plaintiff  
Wells Enterprises, Inc.*

## SO ORDERED:

*Karen Pecci-Danner*  
**U.S.D.J.**  
*6/8/15*